

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

JOHN AND JANE DOE NO. 1,	:	CASE NO. 3:22-cv-00337
et al.,	:	
	:	
Plaintiffs,	:	JUDGE MICHAEL J. NEWMAN
	:	
vs.	:	
	:	
BETHEL LOCAL SCHOOL	:	
DISTRICT BOARD OF	:	
EDUCATION, et al.,	:	
	:	
Defendants.	:	

DECLARATION OF JOSEPH P. ASHBROOK

I, Joseph P. Ashbrook, declare:

1. My name is Joseph Patrick Ashbrook. I am over the age of 21 and fully competent to make this declaration.
2. I have personal knowledge of all of the facts stated in this declaration, and my statements in this declaration are true and accurate to the best of my knowledge, information, and belief.
3. I am an attorney at Ashbrook Byrne Kresge LLC and represent the plaintiffs in the above captioned case.
4. Attached as Exhibit A is a true and correct copy of two emails I sent to Defendants' Counsel, Lynnette Dinkler and John A. Podgurski regarding Justin Firks. The first email I sent was on January 12, 2023 at 11:17

AM asking Counsel if they were representing Mr. Firks. I did not receive a response to this email, so I sent another email on January 13, 2023 at 11:55AM.

I did not receive a response to the question in this email either.

5. I continued to follow up until receiving a response.

I declare under penalty of perjury that the foregoing is true and correct.

5/19/2023
Date



Joseph P. Ashbrook

EXHIBIT A



Joseph Ashbrook <jpashbrook@ashbrookbk.com>

Justin Firks

jpashbrook@ashbrookbk.com <jpashbrook@ashbrookbk.com>

Fri, Jan 13, 2023 at 11:55 AM

To: Lynnette Dinkler <Lynnette@dinkler-law.com>, John Podgurski <ja@johnpodgurski.com>

Cc: Nicholas Barry <nicholas.barry@aflegal.org>, Julie Byrne <jebyrne@ashbrookbk.com>

Lynnette/John – Can you please confirm re the below?

Lynnette – Just tried to call you re your request on Tuesday. Give me a call when you get a chance to discuss.

Thanks,

Joey

From: jpashbrook@ashbrookbk.com <jpashbrook@ashbrookbk.com>

Sent: Thursday, January 12, 2023 11:17 AM

To: 'Lynnette Dinkler' <Lynnette@dinkler-law.com>; 'John Podgurski' <ja@johnpodgurski.com>

Cc: 'Nicholas Barry' <nicholas.barry@aflegal.org>; 'Julie Byrne' <jebyrne@ashbrookbk.com>

Subject: Justin Firks

Lynnette/John,

Are you all representing Justin Firks?

Thanks,

Joey